

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

VINCENT BERRY,

Plaintiff,

v

**CENTRAL MICHIGAN UNIVERSITY,
CENTRAL MICHIGAN UNIVERSITY
MEDICAL SCHOOL, MARK DESANTIS,
MARIE C. MATTE, BRIAN SLENSKI,
TINA THOMPSON, LINDA PERKOWSKI,
DANIEL GRIFFIN, MARC SPENCER, JAMIE
ALAN, ROBERT PETERSON, JULLIEN
ROSSIGNOL, SANDRA HOWELL, and
GEORGE KIKANO,**

Defendants.

Case No. 2:19-cv-10306-TGB-SDD

Hon. Terrence G. Berg
Magistrate Judge Stephanie Dawkins Davis

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PLAINTIFF COUNSEL'S MOTION TO WITHDRAW FROM REPRESENTATION

NOW COMES Plaintiff, Vincent Berry, by and through his counsel of record, **HALL MAKLED, P.C.** and moves for withdrawal from representation from the instant action pursuant to L.R. 83.25(b)(2), stating as follows:

1. Plaintiff's Counsel has sought and received the concurrence of Counsel for Defendants in this Motion to Withdraw from Representation.
2. This case was filed by Plaintiff on January 31, 2019 and Defendants responded with various motions on May 16, 2019, as their first responsive pleading.
3. On or about June 20, 2019 there occurred a substantive and significant breakdown in the attorney-client relationship between Plaintiff and his counsel, HALL MAKLED, P.C. and Plaintiff has expressly terminated the attorney-client relationship.
4. Plaintiff has concurred in the submission of this Motion to Withdraw and has been served a copy of same.
5. The breakdown is irreconcilable and warrants granting the instant motion.
6. Currently pending before this Honorable Court are several motions filed by Defendants, including four (4) Motions to Dismiss, a Motion to Reassign Case, and a Motion for More Definite Statement.
7. On May 24, 2019 this Court entered Notice of Determination of Motion without Oral Argument with respect to the pending Motions.
8. On June 10, 2019 the Court entered a Stipulation and Order Regarding Briefing Schedule, setting June 27, 2019 as the date for Plaintiff to file a Response to the pending motions and set July 18, 2019 as the date for Defendants' Reply.

Based on the forgoing, Plaintiff's Counsel respectfully requests that this Honorable Court grant the instant Motion to Withdraw representation and provide Plaintiff with sufficient time

to obtain and secure new counsel and adjust all scheduling orders and briefing schedules accordingly.

Respectfully submitted,

HALL MAKLED, P.C.

By: Lamont D. Satchel

Lamont D. Satchel (P52647)

HALL MAKLED, P.C.

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PROOF OF SERVICE

The undersigned certifies that a copy of the foregoing instruments were served upon all parties to the above cause to each of the attorneys of record herein at their respective addresses as directed on the pleadings and to Plaintiff Vincent Berry on June 24,, 2019 by:

☐ US MAIL ☐ FAX ☐ HAND DELIVERY ☒ E-MAIL ☒ CERTIFIED MAIL ☒ E-FILE

/s/ Rama Kharboutli
Rama Kharboutli